



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

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January 20, 2004

Mr. Dave Hartshorn
United States General Services Administration
1500 East Bannister Road
Kansas City, Missouri 64131-3088

RE: Hardesty Federal Complex, 601-607 Hardesty Avenue, Kansas City, Missouri

Dear Mr. Hartshorn:

I have reviewed the following reports for the above referenced site: SCS Engineers' Environmental Assessment/PCB Remediation Report dated November 2003; The Hardesty Project Report dated November 2003; Terracon's Off-Site Groundwater Investigation Report dated September 9, 2003; and, Terracon's On-Site Groundwater Investigation Report dated August 20, 2003. I offer the following comments:

1. Please provide a legible schematic diagram of the transformer vault area. If GSA proposes to continue with early transfer authority, an environmental risk assessment would need to be performed since this building may be occupied in the future. If GSA can provide information why an environmental risk assessment would not be required the Brownfields/Voluntary Cleanup Program (B/VCP) would be glad to review this document prior to early transfer.
2. I understand the off-site groundwater investigation will continue until the vertical and horizontal extent of the trichloroethene (TCE) plume is defined. Please be aware the B/VCP requires notification of affected downgradient landowners and copies of the letters sent to those landowners.
3. In addition, the depth at which the groundwater sample was collected was not noted on the included boring log or in Figure 3. Terracon's Off-site Groundwater Report seems to indicate that groundwater samples were collected over various depth intervals (two, four, and twenty-seven foot intervals). Please include sample depths on the borehole logs and monitoring well logs in the future.

In future investigations the installation of permanent monitoring wells may be necessary since well purging more accurately reflects the true level of TCE levels vs. groundwater grab samples.



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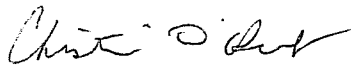
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4. Terracon's On-Site Groundwater Report shows deep and shallow groundwater wells impacted by TCE. Please be sure the injection of hydrogen donor compound for enhanced natural attenuation (as outlined in the remedial alternatives evaluation) covers the entire plume both vertically and horizontally if it is chosen as the remedy.
5. In the On-Site Groundwater Investigation Report bore logs indicate iron ore and slag in the fill material (B-5). Does GSA plan to sample this material since these materials may indicate additional contaminants of concern not already indicated by previous sampling? In addition greenish gray material was also noted in B-4 with visual and olfactory evidence of impact. The boring logs seem to indicate weathered petroleum in this area that may be a result of the former garage located on this side of the property. Although this weathered petroleum may not seem significant the remediation technologies utilized for this constituent is different from other constituents and may interfere with the preferred remediation method selected.
6. In Terracon's Remediation Alternatives Report how does the five sampling cluster points indicate the entire TCE groundwater plume area? The department suggests additional sampling be performed east and south of existing building 6 to better define the plume size. Please be aware that more than one application of Hydrogen Release Compound into the subsurface may be necessary based on contaminant concentration.
7. In Terracon's On-Site Groundwater Investigation Report no samples were taken inside the building or through the floor of Building 6. The Remediation Alternatives Evaluation Figure 1 includes all of Building 6 and part of Building 9 within the groundwater plume. Please be aware that vapor intrusion is an issue nationally at sites just like this one. B/VCP suggests to evaluate vapor intrusions a defensible analysis showing its not needed. Since clothing was treated in this building (Cultural Resources Assessment Report, August 1999) representative samples (VOCs, SVOCs, RCRA metals, TPH) should be obtained from inside the building since old dry cleaning agents contained not only PCE and TCE but also petroleum constituents.

If you have any questions please feel free to contact me at (573) 751-7538 or P.O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

HAZARDOUS WASTE PROGRAM



Christine O'Keefe
Environmental Specialist
Brownfields/Voluntary Cleanup Program

CO:ph